

Safeguarding Policy

Safeguarding Policy	
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1. Policy framework

1.1. Purpose and commitment

The Foundation recognises that the safety and welfare of children and adults is paramount, and we do not tolerate the abuse of any person in any form. We are committed to:

- safeguarding, and recognising our duty of care to children, adults, the organisations that we work with and to those who work for or on behalf of the Foundation;
- creating a safe and secure environment where everyone can work together confidently and with mutual respect;
- considering how safeguarding concerns may become apparent within a ‘think family’ approach. For example, safeguarding concerns about a child may lead to worries about the safety of their adult carer, or a concern about an adult may lead to worries about the wellbeing of their child. This safeguarding policy and procedure applies to both children and adults;
- promoting the safeguarding of all individuals, both in the Foundation and in the organisations that we work with. We recognise that the individuals who use the services of organisations that we support may be particularly vulnerable or at risk of harm and we take seriously our responsibility to promote safeguarding with those we commission to work on behalf of the Foundation with those organisations.

As a charity itself, the Foundation has a responsibility to have a safeguarding policy and procedure in place to ensure that safeguarding concerns are effectively managed, and that safeguarding is effectively promoted throughout the Foundation. This policy and procedure (see Safeguarding policy folder) sets out:

- our commitment to safeguarding;
- our organisational roles and responsibilities;
- how to recognise and respond to concerns;
- provides a safeguarding learning and development strategy to ensure we remain well equipped to respond to safeguarding matters.

This policy and procedure will be updated annually to reflect experience and changes in law and good practice.

Terminology

This document uses the term ‘service user’ broadly to apply to those individuals who may be using the services of organisations or who are in need of safeguarding. This term

is applied in this document for ease and it is recognised that other terms such as beneficiary, client, participant, guest, member or community member are preferred in specific settings.

1.2. Scope

Safeguarding is everyone's responsibility. The commitments and obligations as set out in the Foundation's Safeguarding policy and procedures applies to:

- all staff,
- Trustees and committee members;
- Volunteers and interns;
- Agencies, individuals or organisations employed to deliver services on our behalf.
- Individuals and organisations who interact with children or adults in vulnerable circumstances as part of their engagement with the Foundation (such as visitors to charity partners or any Foundation event or site visit)

It is expected that this policy and procedure will be read, understood and applied by all those listed in the bullet points in 'Scope'. It will be made available at induction and be available for paid staff on the shared drive in Teams and contractors will have it separately available to them.

Organisations who receive funding from the Foundation, our charity partners, are not expected to comply with the Foundation's Safeguarding Policy and accompanying procedures. It is not our role to regulate safeguarding for the organisations we support or 'approve' their safeguarding policies or make referrals on their behalf. We are however required to be confident that they deliver their services safely and have appropriate systems, policies, and procedures in place to safeguard those with whom they work.

1.3. Law and statutory guidance

Our safeguarding policy and the accompanying procedures are underpinned by law and statutory guidance including:

- Charity Commission
- Safeguarding Guidance 2021
- Data Protection Act 2018
- Information Sharing Guidance 2018
- Children Act 1989
- Working Together to Safeguard Children 2023

- Children’s Social Care National Framework 2023
- Care Act 2014
- Care & Support Statutory Guidance 2022
- Social Services and Wellbeing Act (Wales) 2014
- Working Together to Safeguard People Code of Safeguarding Practice 2022 (Wales)
- Wales Safeguarding Procedures and Practice Guides 2021
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Public Interest Disclosure Act 1998

1.4. Alignment with other policies

The Foundation has policies and procedures which collectively promote safeguarding. These should be read alongside this policy and procedure. They include:

- Code of Conduct
- Health and Safety
- Confidentiality / Data Protection
- Photography and Videography
- Equality, Diversity and Inclusion
- Complaints/Grievance procedure
- Recruitment
- Dignity at Work
- Employee Wellbeing
- Disciplinary/Capability Procedure
- Acceptable use of IT / Social Media
- Whistleblowing

The range of policies above may indicate that alongside following the Safeguarding policy, we may also need to follow other policies and work with colleagues in other departments across Foundation such as Human Resources (HR) to address the specific issue of concern.

2. Roles and responsibilities

2.1. Everyone

Everyone is responsible for safeguarding. Everyone should:

- read and apply this safeguarding policy and procedure;
- abide by the LBF code of conduct and be aware of our position of trust;
- be alert to potential indicators of abuse or neglect; aware of the risks which abusers, or potential abusers may pose;
- respond to any safeguarding concerns in the course of their work, however small they may appear using the procedures in this document;
- undertake safeguarding training;

Managers should support their team members through any safeguarding enquiries.

2.2. Designated Safeguarding Lead (DSL)

The DSL has strategic and operational responsibilities for safeguarding at the Foundation and oversees safeguarding on behalf of the Senior Leadership Team. Their responsibilities include:

- promote a safeguarding and listening culture;
- keep updated about changes in safeguarding law and best practice across England and Wales;
- advise and support staff on safeguarding matters;
- support managers to carry out or participate in safeguarding enquiries, and oversee decision-making;
- manage individual safeguarding cases, including decision making, seeking specialist advice, referring to police or social care when necessary, working with external agencies, escalating concerns if required, managing record keeping;
- alerting the Senior Leadership Team to specific safeguarding concerns relating to allegations against staff, poor practice concerns, staff training needs or any other matters relating to the management of safeguarding;
- setting the safeguarding policy and procedure in line with statutory guidance, annually reviewing it and being responsible for its effective implementation across the Foundation;
- ensuring effective safeguarding systems and processes are in place, including secure recording and retrieval systems;

- Appointing additional DSLs (as required) and ensuring that safeguarding is integral in recruitment;
- ensuring all staff receive safeguarding induction and training.
- carrying out internal safeguarding audits and quality assurance safeguarding practice; drawing upon feedback and complaints to ensure the Foundation continually improves safeguarding policy and practices;
- overseeing the management of safeguarding allegations against staff;
- escalating any serious incidents (as per Charity Commission guidance) to Trustees;
- engaging with the Communications team around serious incidents to initiate the Crisis Comms Plan where necessary.
- briefing Trustees on a regular basis about safeguarding activity, including providing an annual report to trustees on safeguarding.

The Foundation's Designated Safeguarding Leads

Sara Canullo, Head of Grant Management

scanullo@lloydsbankfoundation.org.uk – 020 7378 4600

André Clarke, Director of Charity Development

AClarke@lloydsbankfoundation.org.uk – 020 7378 4615

2.3. Trustees

The Trustees are responsible for the governance of safeguarding at the Foundation, ensuring that the organisation is legally compliant and delivering services safely. Their responsibilities include ensuring:

- a culture of safeguarding is promoted whereby anyone can raise concerns and be supported;
- a safeguarding policy and procedure are in place (which includes how to deal with allegations against staff) which is reviewed at least annually, is available to and understood/applied by staff;
- other policies are in place including a staff code of conduct, whistleblowing and recruitment (which includes information about statutory checks on the suitability of staff);

- safeguarding concerns are managed effectively with people, systems and processes in place and safeguarding work is adequately resourced;
- they receive and review regular feedback on safeguarding activity (such as gaps, threats, risks) and oversee a risk register in which safeguarding is included;
- overseeing safeguarding concerns which may have wider implications for the work and reputation of the Foundation. The Chair of Trustees undertakes enquiries in the event of an allegation being made against the Chief Executive;
- compliance with the Charity Commission serious incident notification requirements, and other bodies such as regulators and insurance companies;
- a Lead Safeguarding Trustee is nominated who liaises with the DSL to oversee safeguarding arrangements. The Lead Safeguarding Trustee champions safeguarding and assists the Board to ensure that safeguarding is well-managed, and compliant with legislation and statutory guidance.

The Foundation's Lead Safeguarding Trustee

Cherrie Bija

cherriebija@faithinfamilies.wales – 075900 75009


NB. where the designated Trustee is not available, the Chair of Trustees will take responsibility.

Reports are made through the Audit, Investment and Risk Committee with the exception of any serious incident (as per Charity Commission definition) which would have dual reporting to the Chair of Trustees and the designated Trustee lead for safeguarding at the same time as escalating the issue to the police / social services.

3. Identifying abuse and neglect

3.1. Definition of ‘Safeguarding’

Safeguarding is a term used in the United Kingdom to describe measures to protect the health and wellbeing of all individuals, which allow children and adults to live free from harm, abuse, and neglect.

 *Protecting people and safeguarding responsibilities should be a governance priority for all charities. It is a fundamental part of operating as a charity for the public benefit [...] you must take reasonable steps to protect from harm people who come into contact with your charity.*

This includes people who benefit from your charity’s work, staff, volunteers and other people who come into contact with your charity through its work”.

The Charity Commission guidance – ‘Safeguarding and protecting people for charities and trustees’ 2022

The Care Act 2014 defines ‘adults at risk’ (see definition below) so that it applies to a limited population, but the Foundation recognises that our work seeks to address complex issues and we work with people who are vulnerable even though they may not necessarily have reached the threshold to be described as ‘adults at risk’.

Adult safeguarding is defined in the Care and Support Statutory Guidance, chapter 14 as protecting an adult’s right to live in safety, free from abuse and neglect. It involves people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Safeguarding children is defined in the statutory guidance ‘Working Together to Safeguard Children’, 2023 as:

- protecting children from maltreatment, whether the risk of harm comes from within the child’s family and/or outside (from the wider community), including online;
- preventing impairment of children’s mental and physical health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;

- taking action to enable all children to have the best outcomes.

3.2. Definition of an ‘adult at risk’

Safeguarding adults applies to people who are ‘adults at risk’, this term is defined as someone who is aged 18 years and over and who:

- has care or support needs (whether or not these needs are being met by the local authority);
- is experiencing, or at risk of, abuse or neglect;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

An adult may need care and support and unable to protect themselves from harm for a variety of reasons such as physical or learning disability, mental health difficulties, addiction, age and infirmity.

3.3. Definition of a ‘child or young person’

In England and Wales, a ‘child’ is anyone who has not yet reached their 18th birthday, regardless of whether they have left home or are working. ‘Children’ therefore also means ‘children and young people’ and when they are under 18, they are legally children and entitled to the same protections as any other child.

3.4. Categories and indicators of abuse and neglect

Appendix 1 defines harm and lists types of harm, with signs and indicators of how they may be recognised. It also describes reasons why it may be difficult for individuals to tell about harm they are experiencing.

4. How safeguarding concerns may arise

Safeguarding concerns might be identified because:

- someone says that a service user has experienced harm;
- concerns have been observed;
- there are queries about staff working practices or allegations made against staff.

It is important to remain vigilant to safeguarding in the course of our work whether it is within the Foundation or when we are working with partners or engaging with communities.

5. Information sharing

This policy sets out guidance about information sharing in relation to safeguarding concerns, all other information sharing is covered by the Foundation's data protection policy.

5.1. Sharing with partner or community agencies

Where a safeguarding concern relates to a person or a situation in a partner or community agency, that information must be passed on to the designated safeguarding lead of that partner or community agency. See safeguarding procedures.

5.2. Sharing externally with other agencies

When sharing information about service users with external agencies, the law on confidentiality and information sharing must be applied. The general principle of the Data Protection Act 2018 is that service users' personal information will not be shared with other agencies without their prior consent. However, there are important exceptions when there is a duty to reports and share information that is in the public interest. A person's consent to share information may be overridden in these circumstances:

- a person aged 16 years and over lacks the mental capacity to make that decision (see paragraph on the Mental Capacity Act below);
- there are emergency or life-threatening situations;
- other people are, or may be, at risk, including children or other adults at risk;
- seeking consent could place the individual or others at risk;
- a serious crime has been committed or to prevent serious crime.
- the risk is unreasonably high;
- staff, volunteers or an organisation are implicated.

5.3. Mental capacity

Mental capacity is the ability that a person has to make a decision for themselves, for example giving consent to sharing information. The Mental Capacity Act 2005 (England & Wales) provides the legal framework for making decisions on behalf of people aged over 16 years who lack the mental capacity to make decisions themselves. A person may not be able to make a certain decision at a certain point in time if they have an impairment in their functioning which means they are unable to understand information

about the decision, retain, use or communicate their decision and understand the consequences.

5.4. Duty to report (Wales)

In Wales, the Social Services and Well-being Act 2014 sets out a 'statutory duty to report'. This means that if any person has knowledge, concerns or suspicions that a child, including an unborn child or adult is suffering, has suffered or is likely to be at risk of abuse, it is their responsibility to refer the concerns to social services or police who have powers to make enquiries and intervene when necessary. The duty to report is on relevant partner agencies, however all agencies are expected to report any safeguarding concerns including voluntary sector organisations.

6. Learning and development

All staff **must** be equipped with the knowledge and skills to recognise the possible signs of abuse and neglect and know what to do if they have a concern.

The Foundation offers safeguarding learning opportunities to all staff which may take place through training, briefings, reading or other learning opportunities. Records will be kept of attendance.

6.1. Induction

All new staff when starting work at the Foundation will receive this safeguarding policy and accompanying procedures. They are expected to read it and to agree to apply it when it is so required.

6.2. All staff Development

Within 6 months of starting their role, all staff (excepting Enhance partners and contractors) will receive safeguarding learning and development which will help them to identify abuse and neglect and report it using this policy and procedure. This will then be updated and refreshed every two years.

7. Monitoring and review

The Foundation will ensure that implementation of this Policy is subject to regular monitoring. The Policy will be reviewed annually and whenever there are legislative changes or guidance issued that may impact the Policy, appropriate changes will be recommended to the Trustees for approval.

8. Appendix

8.1. Defining ‘abuse’ and ‘neglect’

Abuse and neglect are types of maltreatment. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Abuse can happen anywhere for example, in a family, institutional or community setting or in a public place or online. Anyone can perpetrate abuse, e.g. family, friends, acquaintances, strangers, staff, adults or children.

8.2. Barriers to speaking out

People may be reluctant to speak out about their experience of abuse and neglect or may delay coming forward because they:

- do not know who to turn to;
- fear not being believed or being taken seriously;
- feel guilt or responsibility for the abuse;
- feel embarrassed about talking to someone about what happened;
- fear the consequences of telling, fear the situation could become worse;
- believe they are protecting others (e.g. the abuser, family members);
- consider the abuse as a ‘normal’ part of their life;
- are pre-verbal, have communication impairment, don’t speak English fluently.

8.3. Categories and indicators of abuse and neglect

The English and Welsh statutory guidance documents list different categories of abuse and neglect for adults at risk and children’s safeguarding as follows:

- In England for adult safeguarding, the Care and Support Statutory Guidance lists ten types of harm: physical abuse, sexual abuse, neglect, psychological abuse, financial abuse, domestic abuse, discriminatory abuse, modern slavery, organisational abuse, and self-neglect;
- In England for children’s safeguarding ‘Working Together to Safeguard Children’ refers to four categories which are: physical abuse, sexual abuse, neglect and emotional abuse;
- In Wales, for both adults and children, five categories are listed in the Social Services Well Being Act: physical abuse, sexual abuse, neglect, emotional abuse and financial abuse.

However, abuse and neglect can take many other forms and it is important that we are alert to any concerns about individuals' wellbeing and safety. The table below lists types of harm, with signs and indicators of how they may be recognised. It is also worth keeping in mind that the list is not exhaustive either and there may be no or few signs for some people.

Category of harm	Possible signs and indicators
Physical Abuse	
<ul style="list-style-type: none"> • Assaults: e.g. hitting, shaking, poisoning, burning, drowning, suffocating • Misuse of medication • Inappropriate restraint or physical sanctions • Fabricated or induced illness 	<ul style="list-style-type: none"> • Bruising, cuts, burns and/or marks on the body, clumps of hair loss, fractures • Frequent and unexplained injuries • Flinching, fear • Covering up injuries
Sexual Abuse	
<ul style="list-style-type: none"> • Forcing or enticing a person to take part in sexual activities • Physical contact and/or non-contact activities • Grooming a person in preparation for abuse 	<ul style="list-style-type: none"> • Injuries, thighs, buttocks, genital area • Infections • Changes in sexual behaviour or attitude • Age-inappropriate sexual behaviour
Neglect	
<ul style="list-style-type: none"> • Failure to provide basic needs (e.g. food, medicine). • Failure to protect from harm or danger • Excluding from home or abandonment 	<ul style="list-style-type: none"> • Unkempt appearance, poor hygiene • Malnutrition and dehydration • Infections, illness – untreated
Emotional or psychological abuse	
<ul style="list-style-type: none"> • Conveying that a person is worthless • Seeing or hearing the ill-treatment of another • Deprivation of contact, isolation • Unreasonable withdrawal of services or support 	<ul style="list-style-type: none"> • Withdrawn or change in behaviour • Uncooperative and aggressive behaviour • Signs of distress: tearfulness, anger • Insomnia, weight loss or gain • Self-harm

Domestic Abuse	
<ul style="list-style-type: none"> Physical abuse; psychological abuse; sexual abuse; financial abuse; emotional abuse; so called ‘honour’ based violence 	<ul style="list-style-type: none"> All the indicators related to physical, sexual, psychological, financial abuse Being in fear or control of another person Lack of independence, isolation
Financial Abuse	
<ul style="list-style-type: none"> Subject to theft, fraud, internet scamming Coerced about finances including about wills, property, inheritance, or financial transactions Misuse or theft of property, or benefits, bank cards 	<ul style="list-style-type: none"> Unable to make reasonable purchases Financial difficulties (without reason) Lack of everyday items (without reason) No access to own money
Modern Slavery	
<ul style="list-style-type: none"> Slavery, human trafficking Forced labour and domestic servitude, sexual exploitation, debt bondage 	<ul style="list-style-type: none"> Poor living or work conditions Lack of identification documents Fear of police or authorities
Discriminatory Abuse	
<ul style="list-style-type: none"> Slurs and harassment due to race, gender, gender identity, age, disability, sexual orientation, religion 	<ul style="list-style-type: none"> Withdrawn and isolated Anger, frustration, fear, anxiety
Organisational	
<ul style="list-style-type: none"> Poor professional practices and systems Abuse and neglect of service users Poor oversight by safeguarding leads 	<ul style="list-style-type: none"> Lack of policy, procedure, management low numbers of staff or poorly trained staff disrespectful attitudes to service users
Self-neglect	
<ul style="list-style-type: none"> Neglect of own hygiene, health or surroundings 	<ul style="list-style-type: none"> Unsanitary conditions that pose risk Not taking prescribed medication.
Radicalisation and Extremism	

<ul style="list-style-type: none"> • Process through which a person comes to support extremist ideologies which can result in a person becoming drawn into terrorism and it is a form of harm 	<ul style="list-style-type: none"> • Sense of not belonging • Change in interests, behaviour • Fixated on an ideology, belief or cause
Online Harm	
<ul style="list-style-type: none"> • Technology can be used to groom and harm people and be involved in sexual exploitation, radicalisation, cyber-bullying, criminal exploitation etc. 	<ul style="list-style-type: none"> • Receiving gifts or money • Withdrawn and secretive • New phone or more than one phone
Female Genital Mutilation (FGM)	
<ul style="list-style-type: none"> • Procedures where female genitalia are cut, removed or changed without a medical reason or other health benefit 	<ul style="list-style-type: none"> • Female relative being cut • Pain, infections, difficulty walking, standing or sitting • Mental health difficulties